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6	
7	IN THE UNITED STATES DISTRICT COURT
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA
9	SAN JOSE DIVISION
10	
11	
	UNITED STATES OF AMERICA, ) Case No. CR11-00550-EJD Plaintiff, )
13 14	) ) ) STIPULATION AND
15	) STIFULATION AND ) [PROPOSED] ORDER CONTINUING ) STATUS CONFERENCE AND
16	V. EXCLUDING TIME FROM MARCH 19, 2012 THROUGH APRIL 16, 2012
17	)
18	ENRIQUE QUINTERO, )
19	Defendant. )
20	
21	Plaintiff United States of America, by and through their counsel Assistant United States
22	Attorney, Thomas O'Connell, and defendant Enrique Quintero, by and through his attorney Michelle
23	D. Spencer, hereby stipulate and agree that, subject to the Court's approval, that the status conference
24	currently scheduled for March 19, 2012 should be continued to April 16, 2012.
25	The parties further stipulate that time should be excluded under the Speedy Trial Act from
26	March 19, 2012 through April 16, 2012 so that defense counsel can conduct additional investigation
	Quintero-[Proposed] Order Excluding Time - 1 -

1	essential to the resolution of this case.
2	
3	IT IS SO STIPULATED.
4	MELINDA HAAG United States Attorney
5	Date: March 14, 2012
6	/S/ THOMAS O'CONNELL
7	Assistant United States Attorney
8	Date: March 14, 2012
9	/MDS/
10	MICHELLE D. SPENCER Attorney for Enrique Quintero
11	IDEONO ODDED
12	[PROPOSED] ORDER
13	Based upon the foregoing stipulation of the parties, and good cause appearing therefor, the
14	Court finds that failing to exclude the time from March 19, 2012 through April 16, 2012 would
15	unreasonably deny the defendant continuity of counsel and the reasonable time necessary for effective
16	preparation, taking into account the exercise of due diligence pursuant to 18 U.S.C. §
17	3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
18	March 19, 2012 through April 16, 2012 from computation under the Speedy Trial Act outweigh the
19	best interests of the public and the defendant in a speedy trial.
20	Therefore, IT IS HEREBY ORDERED that the time from March 19, 2012 through and
21	including April 16, 2012 shall be excluded from computation under the Speedy Trial Act.
22	= $0.00$
23	Date: March 15, 2012 HON, EDWARD J. DAVILA
24	United States District Judge
25	
26	
	Quintero-[Proposed] Order Excluding Time - 2 -

Quintero-[Proposed] Order Excluding Time